



**Educational
Communications
Board**

**Wisconsin Public Broadcasting
and Media Serving You**

**Education Services
Wisconsin Public Radio
Wisconsin Public Television**

Gene Purcell, Executive Director

June 10, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands

Dear Ms. Dortch:

Wisconsin Educational Communications Board (WECB) is writing to support the National EBS Association ("NEBSA") proposal on EBS white space leasing as outlined in NEBSA's ex parte submission on June 5, 2009.

WECB is an agency of the state of Wisconsin and it holds 33 EBS licenses for 23 GSAs centered in 19 counties representing 48% of the state's population and 59% of its land area. For many years, WECB's EBS facilities provided multi-channel coverage of schools and other educational sites throughout Wisconsin. Because of the agency's mission to serve the entire state many of WECB's licenses serve rural areas of the state. WECB's network has undergone the transition to the new wireless broadband plan and its analog video transmissions have now ceased. Despite that, WECB and the state of Wisconsin are committed to the continued use and implementation of WECB's EBS network for the delivery of educational wireless broadband services to the areas of the state we serve.

When WECB originally built the EBS (then ITFS) stations throughout the state, each station was specifically engineered to provide coverage to certain geographic areas. Looking at the GSA coverage of the WECB stations today, there is a significant amount of white space between many of WECB's coverage areas that would make a contiguous wireless broadband infrastructure plan difficult to design and implement.

WECB's ability to fill in those white space gaps would be greatly enhanced under the NEBSA plan for GSA expansion we had originally supported.

Given that opportunity, WECB is very concerned about the consequences if a white space licensing plan based on the Catholic Television Network's June 1, 2009 proposal were to be put into place. Under that proposal, WECB would be limited in each application window to applying for one channel group in the white space of one BTA.



**Educational
Communications
Board**

Wisconsin Public Broadcasting
and Media Serving You

Education Services
Wisconsin Public Radio
Wisconsin Public Television

Gene Purcell, Executive Director

In other words, this limitation would not allow WECB to fill in most of the white space between its stations. And, since many of WECB's licenses are in very rural areas, that separation ultimately means they would have little viability.

As noted, WECB continues to support the NEBSA proposal for GSA expansion. WECB also urges the FCC to permit expanded filing opportunities in any window should it choose to adopt a solution similar to the CTN proposal. Obviously, WECB would like the opportunity to try to expand the coverage of all of its licenses, but in lieu of that, WECB will support an expansion of the filing window that would permit up to 10 applications in a window.

Finally, WECB urges the FCC to resolve these issues as quickly as possible. Given the current availability of BTOP funding, this is a critical time for the deployment of wireless broadband, and WECB's EBS frequencies and adjacent white space should be included in any such deployment.

Respectfully submitted

WISCONSIN EDUCATIONAL
COMMUNICATIONS BOARD

By: 

Executive Director